

EXHIBIT V

BUTLER | SNOW

March 28, 2013

Via E-Mail tcartmell@wagstaffcartmell.com

Tom P. Cartmell, Esq.
WAGSTAFF & CARTMELL, LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112

Re: Pelvic Mesh

Dear Tom:

This letter follows our meet and confer on Friday, March 22, 2013, regarding the 30(b)(6) Design Notice which seeks testimony regarding the “Standard Operating Procedures (SOP) associated with design and development of the Devices” and seeks the production of several categories of documents related to Procedures (see 5(c), (d), (j), (k), (n), (o), (r), 6(a), (b), (c), (d)). This issue was also addressed in your letter dated March 19, 2013. We write to specifically address the production of Procedures. We will respond to the other items that were the subject of our call in a separate letter that will be sent shortly.

During our call, you requested that we produce an index of all Standard Operating Procedures for Ethicon. You suggested that you would review the index and then let us know which of the Procedures Plaintiffs want copies.

Enclosed is a partial list of Procedures from the following departments: Risk Management, Research and Development, Product Performance Evaluation, Regulatory, and Quality Assurance. As noted, this is a partial list of the Company’s procedures; it will take a significant amount of time to confirm this is a complete list. As we have stated to you, the vast majority of these procedures have no relevance to Plaintiffs’ claims. Accordingly, we ask that you review the enclosure and let us know which of these Procedures that Plaintiffs request and the order of priority as quickly as possible.

As you know, Dan Lamont’s deposition is set for April 3 and 4, 2013. At this time, we intend to produce to you in advance of the deposition the current version and the revision histories of the four procedures that Mr. Lamont uses most frequently, which are:

- PR0000118 Franchise Procedure for Product Complaint Management;
- PR 551-005 Company Procedure for Customer Complaint Management;
- PR 551-006 Work Instructions for Summary and Individual MDR Reporting; and
- PR0000385 Franchise Procedure for Post-Market Surveillance.

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We look forward to hearing from you soon and, as stated, are sending you a separate letter to address the other topics we discussed.

Sincerely,

BUTLER, SNOW, O'MARA, STEVENS & CANNADA, PLLC



Chad R. Hutchinson

CRH:ljg
Enclosures

cc: Bryan Aylstock, Esq. (w/enc. via email @ baylstock@awkolaw.com)
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